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21 And RASIER-CA, LLC

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

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IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:

*Jaylynn Dean v. Uber Technologies, Inc., et al., No. 3:23-cv-06708*

Case No. 3:23-md-03084-CRB

**DECLARATION OF DANIEL  
CUMMINGS IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC., RASIER, LLC, RASIER-CA, LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PERSONAL  
IDENTIFYING INFORMATION IN  
EXHIBITS IN SUPPORT OF MOTION  
FOR PARTIAL SUMMARY JUDGMENT**

Judge: Hon. Charles R. Breyer  
Courtroom: Courtroom 6 – 17th Floor

DECLARATION OF DANIEL CUMMINGS IN SUPPORT OF DEFENDANTS' ADMINISTRATIVE MOTION TO FILE UNDER SEAL PERSONAL IDENTIFYING INFORMATION IN EXHIBITS IN SUPPORT OF MOTION FOR PARTIAL SUMMARY JUDGMENT

## **DECLARATION OF DANIEL CUMMINGS**

I, Daniel Cummings having personal knowledge of the following state:

1. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, “Uber”). I am a member in good standing of the Bars of the States of Missouri, Kansas, and Nebraska. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC’s Administrative Motion to File Under Seal Personal Identifying Information in Exhibits in Support of Motion for Partial Summary Judgment (“Motion to Seal”).

2. I have reviewed Defendants' Motion for Partial Summary Judgment, filed November 10, 2025, and all exhibits and materials in support thereof, including Exhibits 22-34.

3. The limited portions of the exhibits in support of the Motion for Partial Summary Judgment, which Defendants seek to seal, contain personal identifying information (“PII”)—specifically, DOB (full and partial, month and date), partial SSN, driver’s license number (full and partial), email address, and phone number.

4. Exhibits 22-34 to Defendants' Motion for Partial Summary Judgment are background check reports for the independent driver at issue in the Dean case from third-party background check provider Checkr. These background check reports contain PII, specifically DOB (full and partial, month and date), partial SSN, driver's license number (full and partial), email address, and phone number.

5. Defendants seek to seal the above-described PII. They do not seek to seal the independent driver's name or any other content in these exhibits.

6. Disclosure of the above-described PII would violate the independent driver's legitimate privacy interests and would risk identity theft or other misuse by malicious actors.

7. There are no less restrictive alternatives to sealing the documents—Defendants seek only narrowly tailored redactions to limited portions of certain exhibits in support of the Motion for Partial Summary Judgment containing PII.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 10, 2025.

By: /s/ Daniel Cummings

## Daniel Cummings